

Petaluma Poultry
Comment to the National Organic Standards Board
Austin, Texas
May 6, 2002

Access to Outdoors for Broiler Poultry

Petaluma Poultry has been raising and processing "Free Range" chickens without the use of antibiotics or animal byproducts for over 15 years. Our company was one of the first to offer the consumer a "Free Range" chicken and was the first to introduce a "100% Certified Organic" chicken in 1999.

Over the last year, the NOSB has been wrestling with the issue of, "Access to Outdoors" for poultry. In your draft you state, "Public comment for the two proposed rules on national organic standards shows a **clear expectation** that consumers have for access to outdoors as part of humane management for organically raised livestock".

As I read this quote and reread the draft there seems to be a disconnection between the consumer's "Clear Expectation" of outdoor access and what in fact the draft recommendation is saying. Organic chickens will only be allowed to move freely out of and into their houses when it is convenient and economically feasible for the farmer. The health and welfare of the chicken is always of utmost importance but it seems that economics are playing a larger role.

Words and statements such as, "When Feasible", "When Justified", and "Temporary Confinement" will allow farmers to confine their chickens indoors when outside conditions will not benefit the well being of the animals. But we have to take care that "When Feasible" and other exceptions are not interpreted as "Whenever it serves the Economics of my Farm". We cannot allow animal health and well being to be determined by business health and well-being.

The future of organic agriculture is based on the trust and confidence the consumer has in the farmers, processors, manufacturers and retailers within the organic community. If that trust is broken or diluted what all of us have worked for over the past 30 years will be gone. We must remember what the organic farming community is doing to preserve that trust and what the consumer is expecting from organic agriculture. The confidence the consumer has in our community must remain strong for our industry to thrive.

I urge you to review your recommendation to insure that Outdoor Access for Poultry will be a reality and not overridden by loopholes in the rule.

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